

B20A (Official Form 20A) (Notice of Motion or Objection) (12/10)

EDVA (12/10)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Donald Wayne Andrews Jr)

[Set forth here all names including married, maiden, and trade names used by debtor within last 8 years.]

Debtor

Address 2408 BURGAGE (Ave
S. Prince George VA 23865)

Last four digits of Social Security or Individual Tax-payer Identification (ITIN) No(s).,(if any): 0072

Employer's Tax Identification (EIN) No(s). (if any):

NOTICE OF MOTION (OR OBJECTION)

Petitioner has filed papers with the court to Protect
Education Records

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before _____, you or your attorney must:

File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court
United States Bankruptcy Court**

2015 JAN 26 PM 12: 50

**U.S. BANKRUPTCY COURT
RICHMOND DIVISION**

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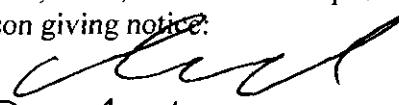
You must also mail a copy to:

- Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**
- Attend the hearing on the motion (or objection) scheduled to be held on _____ at _____ m. at United States Bankruptcy Court, _____.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 1/26/2015

Signature, name, address and telephone number
of person giving notice:


Don Andrews
2408 Busine Lane
S. Prince George VA 23805
Virginia State Bar No. _____
Counsel for _____

Certificate of Service

I hereby certify that I have this 26 day of Jan, 20 15, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.



UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Donald Wayne Andrews, Jr.

Case No.: 14-36384-KRH

Chapter: 7

U.S. BANKRUPTCY COURT
RICHMOND DIVISION
2015 JAN 26 PM 12:50

FILED

MOTION TO FOR PROTECTIVE ORDER OF EDUCATION RECORDS

COMES NOW Petitioner, and moves this honorable Court for a protective order of petitioner's education records. In support of this motion Petitioner states as follows:

1. Trustees Lubman and Pecoraro have requested several times that Petitioner disclose "Details regarding [Petitioner's] education background", and both Lubman and Pecoraro accused Petitioner several times of committing bankruptcy fraud by not disclosing "if [Petitioner] earned a diploma in school".
2. The information/documents requested are protected and privileged by the Family Education Rights and Privacy Act (FERPA) 20 USC 1232g.
3. The U.S. Trustee has demanded on several occasions Petitioner disclose his education background, which is utterly ridiculous, and not germane to Petitioner's bankruptcy petition.
4. Petitioner has properly disclosed all financial information related to his educational loans, and the Trustees Office has taken this disclosure as an invitation to go on a fishing expedition. The Trustees Office is clearly asking for elaborate and unnecessary documentation in an effort to seek a dismissal of the bankruptcy petition for non-compliance. All of this in an attempt to afford the attorneys from Wolcott Rivers Gates another attempt to have Petitioner incarcerated for attorneys fees.
5. The Petitioners filing of his bankruptcy petition in no way waives the protections afforded under the Family Education Rights and Privacy Act (FERPA) 20 USC 1232g.
6. Petitioner has a Fourth Amendment Right to Privacy and Section 107 does not mandate the disclosure of education records which are unnecessary for the Trustee to make an educated decision in regard to the bankruptcy petition.

WHEREFORE, Petitioner respectfully prays the Court enter an order allowing Petitioner not to disclose his education records.

Date:

1/25/2015



Donald Wayne Andrews, Jr.
2408 Burgage Lane
S. Prince George, VA 23805
(757) 701-6904

CERTIFICATE OF SERVICE

I hereby certify that a copy of MOTION TO FOR PROTECTIVE ORDER OF EDUCATION RECORDS was mailed via first class mail on January 26, 2015 to:

U.S. Department of Justice
Office of the United States Trustee
701 E. Broad Street
Suite 4303
Richmond, VA 23219



Donald W. Andrews Jr., Plaintiff
2408 Burgage Lane
Petersburg, VA 23805